

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

In re:

GERALD KEITH SUZORE,  
Debtor.

Case No. 13-24153-pjd  
Chapter 7

**APPLICATION OF EDWARD L. MONTEDONICO, ESQ. FOR ORDER  
APPROVING EMPLOYMENT OF JAMES E. BAILEY III AND THE LAW FIRM OF  
BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC FOR THE  
PURSUANT TO 11 U.S.C. § 327 AND FED. R. BANKR. P. 2014(a)**

The above named Applicant respectfully represents:

1. Applicant, Edward L. Montedonico, is the duly appointed Trustee. Applicant wishes to employ, on an hourly rate basis, James E. Bailey III and the law firm Butler, Snow, O'Mara, Stevens & Cannada, PLLC, a law firm whose attorneys are duly admitted to practice in this Court, as counsel in this case pursuant to 11 U.S.C. §§ 327 and 328 and FED. R. BANKR. P. 2014(a).

2. Your Applicant has selected Mr. Bailey and the Butler Snow law firm for the reason that they have had considerable experience in matters of this character, and Applicant believes that they are well qualified to represent him as counsel to the Trustee in this case.

3. To the best of Applicant's knowledge, Mr. Bailey and the Butler Snow law firm and its attorneys have no connection the Debtor, with her creditors, accountants, or any other party in interest, or their respective attorneys.

4. Mr. Bailey and the Butler Snow law firm and its attorneys, represent no interest adverse to the applicant or the estate in the matters upon which they are to be engaged for applicant and their employment as counsel would be in the best interest of this estate. The Verified Statement of Attorney is attached hereto as ***Exhibit 1***.

5. Applicant has no funds in the estate to compensate an attorney at this; however, Applicant has agreed to employ said firm and its attorneys and Mr. Bailey has agreed to represent Applicant on an hourly rate basis. Said arrangement is subject to Court review upon proper Applications for Compensation by Applicant.

6. The professional services to be rendered by Mr. Bailey and the Butler Snow law firm are to represent Applicant in the potential sale of property of the estate.

7. The persons likely to be involved in this representation and their respective hourly rates are as follows:

James E. Bailey III	Member	\$335.00/hr.
R. Campbell Hillyer	Associate	\$235.00/hr.

8. Butler Snow periodically adjusts the rates of its attorneys and the services to be rendered will be billed at the rates in effect at the time said services are rendered.

**WHEREFORE**, your Applicant prays that his employment of James E. Bailey III and the Butler Snow law firm and its attorneys, as counsel to the Trustee in this case under chapter 7 be approved by the Court and that he have such other and further relief as is just.

**APPLICANT**

/s/ Edward L. Montedonico  
Edward L. Montedonico  
200 Jefferson Avenue  
Suite 201  
Memphis, TN 38103  
(901)521-9390

**BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC**

/s/ James E. Bailey III  
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**Proposed Attorneys for Edward L. Montedonico  
Chapter 7 Trustee**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been forwarded to the Debtor's attorney and the Office of the U.S. Trustee, 200 Jefferson Avenue, Suite 400, Memphis, Tennessee, 30103 via U.S. mail, postage pre-paid, or electronic transmission this 28<sup>th</sup> day of June, 2013.

/s/ James E. Bailey III